

EXHIBIT P

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UMG RECORDINGS, INC., et al.,)
Plaintiffs,)
vs.)
GRANDE COMMUNICATIONS) No. 1:17-cv-00365
NETWORKS LLC and PATRIOT MEDIA)
CONSULTING, LLC,)
Defendant.)
)

**DEFENDANT PATRIOT MEDIA
CONSULTING, LLC'S AMENDED INITIAL DISCLOSURES**

Defendant Patriot Media Consulting, LLC (“Patriot”), in accordance with Federal Rule of Civil Procedure 26(a)(1), provides the following disclosures. Patriot’s disclosures represent a good faith effort to identify discoverable information that it reasonably believes may be used to support its claims or defenses as required under Rule 26(a)(1).

These disclosures do not include information that may be used solely for impeachment or rebuttal purposes. Patriot’s disclosures are made without waiving (1) any claim of privilege or work product; (2) the right to object on the grounds of competency, relevancy, materiality, hearsay, or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in this or any other action; and (3) the right to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

Finally, these disclosures do not identify or otherwise include information concerning experts, as this subject is not covered by Fed. R. Civ. P. 26(a)(1). Patriot will provide expert

disclosures at the appropriate times in accordance with the Court's scheduling order.

A. *The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims and defenses, unless solely for impeachment, identifying the subjects of information.*

1. Matt Rohre, Senior Vice-President, Operations & General Manager, Grande Communications Networks LLC. Mr. Rohre can be reached through Patriot's counsel. Mr. Rohre is likely to have discoverable information relating to Grande's policies and procedures and the relationship between Grande and Patriot.

2. Lamar Horton, Vice-President, Network Engineering and Operations, Grande Communications Networks LLC. Mr. Horton can be reached through Patriot's counsel. Mr. Horton is likely to have discoverable information relating to Grande's network design and information technology processes.

3. Dawn Blydenburgh, Vice-President, Customer Service, Grande Communications Networks LLC. Ms. Blydenburgh can be reached through Patriot's counsel. Ms. Blydenburgh is likely to have discoverable information relating to Grande's customer support.

4. Bruce Jongeneel, Corporate Vice-President, Finance, Grande Communications Networks LLC. Mr. Jongeneel can be reached through Patriot's counsel. Mr. Jongeneel is likely to have discoverable information relating to Grande's financials.

5. Matt Murphy, former CEO and President, Grande Communications Networks LLC. Mr. Murphy can be reached through Grande's counsel. Mr. Murphy is likely to have discoverable information relating to Grande's historical policies and procedures.

6. Shane Shilling, former Vice-President, Network Services, Grande Communications Networks LLC. Mr. Shilling can be reached through Grande's counsel. Mr. Shilling is likely to have discoverable information relating to Grande's historical network design

and information technology processes.

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in possession, custody, or control of the party that the party may use to support its claims and defenses, unless solely for impeachment.

Categories and locations of documents, data, compilations, and tangible things, in Patriot's possession, custody, or control, potentially relevant to the claims and defenses of the parties include:

1. Documents related to the architecture of Grande's network.
2. Documents related to the pricing strategy of Grande's services.
3. Documents relating to Grande's policies and procedures relating to the Digital Millennium Copyright Act.
4. Documents relating to records of purported infringement notices received from Plaintiff's and others.
5. Documents relating to the costs and other harms incurred or suffered by Grande as a result of purported infringements committed on its network.
6. Documents relating to Grande's policies regarding subscriber privacy and the protection of subscriber personal information.
7. Documents evidencing competition in the market for internet services in the geographic areas that Grande serves.
8. Documents relating to the uses to which Grande subscribers put their internet services.
9. Documents relating to the relationship between Grande and Patriot.
10. Documents relating to Grande's ability/inability to monitor customer internet activities.

11. Documents relating to Grande's ability/inability to obtain information about files residing on customer hardware and/or software running on customer's hardware.

12. Documents relating to Grande's efforts to market its internet services.

Patriot's investigation is continuing, and Patriot reserves the right to amend and supplement the foregoing disclosures as necessary.

C. *A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.*

N/A

D. *For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.*

Patriot is aware of no such agreement.

Dated: July 20, 2017

By: /s/ Richard L. Brophy

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CERTIFICATE OF SERVICE

The undersigned certifies that on July 20, 2017, the foregoing was served via email to the recipients listed below.

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